

### **UNITED STATES MARINE CORPS**

#### MARINE CORPS BASE 3250 CATLIN AVENUE QUANTICO, VIRGINIA 22134 5001

MCBO 6280.4A B 046 6 Aug 13

#### MARINE CORPS BASE ORDER 6280.4A

From: Commander

To: Distribution List

Subj: HAZARDOUS MATERIAL MANAGEMENT PROGRAM

Ref: (a) Superfund Amendments and Reauthorization Act, Title III

- (b) Pollution Prevention Act of 1990
- (c) Executive Order 13423 of 24 Jan 07
- (d) CMC ltr 4440 L/S-4440 of 28 Aug 98
- (e) Marine Corps Base Quantico Environmental Standard
  Operating Procedure 3 Hazardous Material Management
- (f) MCO P5090.2A
- (g) 29 CFR 1910.1200 (b)(6)(ix)
- (h) 29 CFR 1900.1200
- (i) 49 CFR 173.2
- (j) 40 CFR 261, subparts A, B, C, or D
- (k) MCBO P5100.1C
- (1) MCBO P11320.1
- (m) National Fire Protection Association Standards

#### Encl: (1) Definitions

- (2) Hazardous Material Authorization Request Approval Form Authorized Use List (AUL)
- (3) Hazardous Material Usage Report
- (4) Hazardous Material Received Form
- (5) Natural Resources and Environmental Affairs Branch Marine Corps Base, Quantico Hazardous Material Management ESOP Checklist
- 1. <u>Situation</u>. Initially, Federal installations such as Marine Corps Base Quantico (MCBQ) were exempt from compliance with reference (a); however, with the passage of reference (b) and the issuance of references (c) and (d), compliance with all community right-to-know laws, reporting requirements, reduction in the use of chemicals and toxic materials, and other pollution prevention acts are mandated for all federal installations.

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2. Cancellation. MCBO 6280.4.

## 3. Mission

- a. Per the references, promulgate policy and procedures for the management, minimization and/or elimination of hazardous material (HM) aboard MCBQ.
- b. This revision contains minor changes to nomenclature and clarification of procedures, but does not substantially alter the actions of the affected activities.

#### 4. Execution

#### a. Commander's Intent and Concept of Operations

- (1) <u>Commander's Intent</u>. To effectively manage HM located aboard MCBQ from "cradle-to-grave," through the Hazardous Materials Management Program (HMMP) in accordance with reference (e).
- (2) Concept of Operations. MCBQ will reduce the amount of HM procured and used, and the amount of subsequent hazardous waste (HW) generated, by up-front HM control in procurement, supply and management. MCBQ will implement pollution prevention (P2) measures to eliminate/minimize environmental costs, minimize procurement of HM and/or reduce the generation of pollution from operations. The combination of these efforts will reduce the amount of HM used, the HW generated, unnecessary risks, and the associated costs. This supports mission readiness, provides enhanced safety in the workplace and minimizes environmental impacts. To achieve these objectives this command will:
- (a) Implement comprehensive HM management policies and standard operating procedures to control and minimize the procurement of HM;
- (b) Establish, monitor, and enforce the use of a MCBQ HM AUL for all MCBQ activities and tenant commands;
- (c) Implement an environmental management hierarchy, based on: 1) source reduction, 2) material recycling, 3) treatment, and 4) disposal. This will focus on substituting less or non-hazardous material whenever possible and promoting

the use of recycled or environmentally preferable products or services; and

(d) Establish and implement the HM component of the MCBQ Pollution Prevention Plan in accordance with references (c), (d) and (f).

#### b. Coordinating Instruction

- (1) Procurement of HM. All HM at a work center must be listed on the work center's Authorized Use List (AUL). A work center that requires HM not on the current AUL must complete and submit enclosure (1) to the Natural Resources and Environmental Affairs (NREA) Branch, G-5 Division for review and approval before procuring the HM. The requesting work center must submit justification for the new HM, a copy of the Material Safety Data Sheet (MSDS), and the work center supervisor's endorsement.
- (2) <u>MSDS Maintenance</u>. A MSDS shall be maintained for all hazardous substances.
- (3) <u>Hazardous Material Storage</u>. All HM aboard MCBQ shall be stored, managed, handled, and maintained to ensure compliance with references (k) and (l), and this Order. Every work center is subject to regular and unannounced inspections to ensure compliance.
- (4) Tracking Hazardous Material. All HM must be entered into the Hazardous Substance Management System (HSMS)/Hazardous Materials Management System (HMMS) program. All HM aboard MCBQ must have a HSMS/HMMS bar code attached at all times and is subject to periodic announced and unannounced inspections. HM without the appropriate bar code attached is subject to confiscation by inspectors.
- (5) Reporting Requirements. All work centers must provide monthly Hazardous Material Usage Reports, enclosure (2), to NREA Branch. When a container of HM is empty, the HM is no longer needed or required, the HM cannot be used for its intended purpose, or is determined to be HW by NREA Branch, it will be removed from the work center's monthly HM Usage Inventory Report, but will remain on the work center's AUL.

#### c. Subordinate Element Missions

#### (1) Activity Heads will:

- (a) Ensure that all work centers using HM shall review and post, standard operating procedures for hazardous material management using reference (e);
- (b) Verify that proposed HM procurement is included on the AUL for that work center. Requests for the procurement of HM not on an approved AUL must be documented, reviewed and endorsed by the work center supervisor and NREA Branch before purchase, using enclosure (1);
- (c) Check with NREA Branch before purchasing additional HM, to determine if the requested HM is available for reissue. If the requested HM is available, issue will be accomplished from the Hazardous Waste Storage Facility, Building 27401;
- (d) Notify NREA Branch upon receipt of ordered materials using enclosure (3). Bar codes will be provided to the work center. Upon receipt of bar codes, work center personnel shall ensure bar codes are affixed properly to the HM. Alternately, work center personnel may pick up the bar codes at the Compliance Section, NREA Branch, Building 3049; and
- (e) Submit a monthly HM Usage Report to NREA Branch by the 5th of every month, using enclosure (2).
- (2) Natural Resources and Environmental Affairs Branch, G-5 Division will:
- (a) Establish, maintain and provide support to enter HM into the HM tracking program;
- (b) Provide AULs to work centers and bar code HM used and stored at each work center;
- (c) Enter all HM receipts into the HM tracking system and provide bar codes to the work center for all HM received;
- (d) Provide a list of excess HM available for re-use and update this inventory list weekly;
- (e) Respond to requests to modify a work center's AUL
  within five working days;

- (f) Conduct regular and unannounced compliance inspections to ensure all HM is bar coded, used and managed per this Order using enclosure (4); and
- (g) Provide classroom and on-the-job training to implement this Order. Promote and implement emerging Pollution Prevention initiatives and programs aboard MCBQ per federal laws, regulations, Executive Orders, Marine Corps Orders, policy and guidance.
- (3) <u>Public Works Branch and Resident Officer in Charge</u> of Construction will:
- (a) Ensure that contracts awarded for maintenance, repair, and new construction aboard MCBQ identify all HM management requirements of this Order; and
- (b) Ensure environmental protection plans are required by all contracts and that they address HM/HW management.
- (4) <u>Director</u>, <u>Safety Division</u> will review NREA Branch forwarded AUL requests regarding potential safety and hazard communication issues. After review, forward replies to AUL committee.
  - (5) Commanding Officer, Security Battalion will:
- (a) Ensure HM is identified and stored (e.g. compatibility, corrosivity, flammability) properly during fire safety inspections;
- (b) Provide technical guidance and support to ensure HM management per reference (m); and
- (c) Advise NREA Branch and Safety Division of any deficiencies relating to HM management.
- 5. Administration and Logistics. Using an electronic HM tracking system (e.g., [HSMS] or Hazardous Materials Management System [HMMS]), the HMMP tracks the types (e.g., solid, liquid, aerosol), variety (e.g., manufacturer), and quantities of HM procured, stored, used, and ultimately disposed by MCBQ. The HMMP does not restrict, inhibit or conflict with mission requirements. A component of the HMMP is the Hazardous Material Authorization Request Approval Form (AUL) which aids in

minimizing and/or preventing unauthorized HM use or procurement. Appropriate HM management reduces the amount of HM procured, stocked, distributed to work centers, and disposed as waste, see enclosure (5).

### 6. Command and Signal

- a. <u>Command</u>. All MCBQ activities, tenants and contractors shall comply with the requirements of this Order.
  - b. Signal. This Order is effective the date signed.

/s/ DAVID W. MAXWELL

DISTRIBUTION: A

#### Definitions

- a. <u>AUL</u>. The list of approved HM necessary to support the mission requirements of the command, facility or activity. The AUL includes all consumer-use quantities of HM required.
- b. <u>Consumer-Use Quantities</u>. HM used in the workplace in such quantities "where the employer can show that it is used in the workplace for the purpose intended by the chemical manufacturer or importer of the product, and the use results in a duration and frequency of exposure which is not greater than the range of exposures that could reasonably be experienced by consumers when used for the purpose intended" per reference (g).
- c. <u>Environmentally Preferable</u>. Products or services that have a lesser or reduced effect on human health and the environment when compared with competing products.
- d. Environmental Management Hierarchy. In reference (b), Congress declared "it to be the national policy of the United States that pollution should be prevented or reduced at the source whenever feasible; pollution that cannot be prevented should be recycled in an environmentally safe manner, whenever feasible; pollution that cannot be prevented or recycled should be treated in an environmentally safe manner whenever feasible; and disposal or other release into the environment should be employed only as a last resort and should be conducted in an environmentally safe manner."
- e. <u>Hazardous Chemical</u>. A chemical that is a physical or health hazard as defined in reference (h).
- f. HM. In general, any material, which because of its quantity, concentration or physical, chemical or infectious characteristics, may pose a substantial hazard to human health or the environment. This Order does not address hazard specific guidance (instructions or directives) that take precedence over this Order for: ammunition, weapons, explosives and explosive-actuated devices, propellants, pyrotechnics, chemical and biological warfare materials, medical and pharmaceutical materials, medical waste and infectious materials, bulk fuels,

radioactive materials, and other materials such as asbestos and mercury.

- g. <u>HMMP</u>. The MCBQ HMMP is designed to achieve life-cycle control and management of HM through the application of sound management practices that reduce the types and quantities of HM procured, and that identify lower risk HM to accomplish mission requirements at commands and activities.
- h. <u>Hazardous Substance</u>. Any material that is regulated as HM per reference (i), requires a material safety data sheet (MSDS) per reference (h), or which during end use, treatment, handling, packaging, storage, transportation, or disposal meets or has components that meet or have the potential to meet the definition of HW as defined by reference (j) and which pose a substantial hazard to human health or the environment when improperly treated, stored, transported, disposed, or otherwise managed.
- i. <u>HSMS/HMMS</u>. HSMS/HMMS are automated tracking systems designed to provide "cradle-to-grave" tracking not only of the HMs used at a facility, but also the chemical constituents of those materials. The system also provides Department of Defense activities with a tool to facilitate their HMMP and which can also be used to analyze the flow of HMs through their activity, and then develop sound pollution prevention initiatives.
- j. <u>HW</u>. Solid waste which, as a result of physical or chemical characteristics, may pose a potential hazard to human health or the environment when improperly treated, stored, disposed, or otherwise managed. Solid waste is a HW if it exhibits one of four characteristics (ignitability, corrosivity, reactivity, and/or toxicity) or it appears as a listed HW. Solid waste is any discarded material and may be a liquid, gas, semi-solid, or solid. Any container that contains more than 1-inch of hazardous residue is considered to be a HW.
- k. <u>Pollution Prevention</u>. Practices that reduce or eliminate the creation of pollutants through input substitution, product reformulation, process redesign or modification, improved operation and maintenance, and/or re-use.

1. Source Reduction. Any practice, which reduces the amount of any hazardous substance, pollutant, or contaminant entering any waste stream or otherwise released into the environment (including fugitive emissions) prior to recycling, treatment, or disposal; and which reduces the hazards to public health and the environment associated with the release of such substances, pollutants or contaminants. The term includes equipment or technology modifications, process or procedure modifications, reformulation or redesign of products, substitution of raw materials, and improvements in housekeeping, maintenance, training, or inventory control. Source reduction does not include any practice that alters the physical, chemical, or biological characteristics or the volume of a hazardous substance.

# NATURAL RESOURCES AND ENVIRONMENTAL AFFAIRS MARINE CORPS BASE, QUANTICO AUL APPROVAL FORM

Requesting Organization			Authorization Control Number: NREA -			
Cost Center	Shop Number (if			applicable)		Building Number
Stock Number	Nome	Nomenclature				Container Size/Type
Part Number	MSDS Number			Monthly Requirement		equirement
Manufacturer Address						
Process (Fully describe work activity by which the material will be used. Identify method of application applicable end item(s) and waste streams affected.)						
Justification:						
I CERTIFY THAT THE MATERIAL (Name, ID, Organization, Tel)		IRED A	AS STAT	ED ABOV	Æ. (Respon	sible Supervisor
Signature:						
Printed Name and Rank:						
Organization and Telephone: Date:						
Approving Activity	Appr Yes	= =		Date	Comments	
HSMS POC:						
NREA POC:						

Hazardous Material Usage Report

	Onhand	
	Used	
j	Received	
	Serial #. Container Size	16 OZ CN 1 GL CO 10 OZ BT 11 OZ CN 11 OZ CN 9 OZ CN
	Serial#.	5510 5511 5514 5515 5516 5517 5518
	MSDS	HBSYYN HCBOPL HCLGMN HCFFLB HBXFXW 000316 HBXHCC
MCB Quantico MCB Quantico	Nomenclature	PAINT FLAT OLIVE DRAB CLEANER LUBRICANT PRESERVATIVE LUBRICATING OIL OIL LUBRICATING COMPOUND CLEANING RIFLE BORE PAINT COLORPLACE SPRAY ENAMEL GREEN 20022 PAINT ENAMEL GLOSS YELLOW 13538 AEROSOL
- 89 . 89		•
Work Center: MC Location: MC	NSN	8010 005843149 9150 01053668 9150 006874241 9150 014159111 6850 002246663 8010 LL0000742 8010 013316115

ENCLOSURE (2)

HAZARDOUS MATERIALS RECEIVED

Work Center:		Bldg No:		Phone No:	
Stock Number	Item Nomenclature	Part No.	Container Size / Type	Manufacturer Name	Quantity
					·
		-			
			-		
Note: An AUL Appro	Note: An AUL Approval Form and an MSDS is required	for each ite	m if the item is	is required for each item if the item is not listed on the Work Center AUL	AUL



# Natural Resources and Environmental Affairs Branch Marine Corps Base, Quantico

Hazardous Material	s Management ESOP Checklist	
Unit Name:	Date:	
POC:	Completed By:	
Phone/Fax:		
Building #:		
Hazardous Material M	anagement Procedure	
" $\sqrt{"}$ Place a $\sqrt{"}$ next to actions that		
Monthly Usage Report	Notes	
1. Obtain usage report from website	•	
2. Conduct HM Inventory.		
3. Complete Usage Report.	ho Eth of	
4. Submit Usage Report to NREA by t each month.	iie 5 01	
New Material		
1. Check with NREA for material re-	issue.	
2. Purchase new material (on AUL) i	f none	
available for re-issue.		
3. Once new material is received, o Material Received Form from website.		
4. Complete New Material Received F	orm.	
5. Submit New Material Received For NREA.	m to	
6. After receive new labels from NR	EA, affix	
labels to new material.		
AUL Request  1. Check AUL for requested material		
_		
2. For material not listed on AUL, complete AUL Request Form (include MSDS).		
3. AUL Request Form approved by sup	ervisor.	
4. Submit AUL Request Form to NREA	for	
approval.	not	
5. If approved, order material. If approved, research another material.	1100	
HM Disposal		
Call NREA for pickup, 784-4030.		